

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, <i>ex rel.</i>)	
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,)	
V. RAO NADELLA, M.D., and)	
MARTIN JACOBS, M.D.,)	
)	
Plaintiffs,)	CIVIL ACTION NO. 04-186-E
)	
v.)	JUDGE COHILL
)	
)	
BRADFORD REGIONAL MEDICAL CENTER,)	
et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION TO FILE UNDER SEAL

1. On Friday, August 24, 2007, Defendant Bradford Regional Medical Center ("BRMC") filed a Motion to Quash a subpoena served on Daniel M. Mulholland III.
2. As Plaintiffs were preparing their response to the motion, the Court entered an order on Tuesday, August 28, 2007, granting the motion without prejudice. In the order, the Court noted that it "do[es] not have sufficient information at this point" to consider whether Mr. Mulholland's deposition was appropriate for certain reasons.
3. Plaintiffs desire to file their response to the Motion to Quash in order to provide the Court with information as to why Mr. Mulholland's deposition is appropriate.
4. Plaintiffs' response discusses and attaches as exhibits materials which Defendants have designated as "Confidential" pursuant to a Protective Order signed by the Court on February 27, 2007, including transcripts of depositions taken in this case.

Although Plaintiffs have objected to the designation of the entire deposition transcripts as confidential, such designation remains in place at this time. Accordingly, pursuant to the terms of the Court's Protective Order, Plaintiffs believe that the response must be filed under seal.

5. Accordingly, Plaintiffs respectfully request leave of court to file said response under seal in accordance with the Protective Order and Misc. Order No. 05-45 (WD Pa. 1/27/2005).

This 31st day of August, 2007.

Andrew M. Stone
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Certificate of Service

I hereby certify that on August 31, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

Daniel M. Mulholland, III
Carl J. Rychcik
Paul E. Skirtich

This 31st day of August, 2007.

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